



OCT 29 2019

October 28, 2019

Mr. Eric Gustafson
Air Quality Program Manager
Pennsylvania Department of Environmental Protection
Northwest Regional Office
230 Chestnut Street
Meadville, PA 16335-3481
UPS Tracking No. 1ZV31Y26A494863899

US EPA Region III, Air Protection Division
Office of Air Enforcement & Compliance Assistance - NSPS
1650 Arch Street (3AP00)
Philadelphia, PA 19103-2029
UPS Tracking No. 1ZV31Y26A490987905

RE: Annual Compliance Report – NSPS 0000 & 0000a
 NSPS Subpart 0000 – Compliance Period: August 2, 2018 – August 1, 2019
 NSPS Subpart 0000a - Compliance Period: August 2, 2018 - August 1, 2019
 NFG Midstream Clermont, LLC – Clermont West Compressor Station (GP5-24-180D)

Dear Mr. Gustafson:

NFG Midstream Clermont, LLC (Clermont) is submitting this letter and attachments to meet the annual reporting requirements of New Source Performance Standard Subpart 0000 (40 CFR §60.5420) and 0000a (40 CFR §60.5420a) for affected facilities constructed, reconstructed, or modified after August 23, 2011 and September 18, 2015 respectively. Per §60.5420(b) and §60.5420a(b), Clermont is submitting this annual report for affected facilities located in the jurisdiction of the Pennsylvania Department of Environmental Protection (PADEP) Northwest Regional Office (NWRO).

The most recent NSPS Subpart 0000 Annual Report for Clermont West Compressor Station was submitted on October 24, 2018 for a compliance period beginning August 2, 2017 and ending August 1, 2018 to align with the NSPS 0000a compliance period. Only five (5) of the compressor engines (i.e., ENG 001 through ENG 005) are subject to NSPS 0000 reporting requirements as Reciprocating Compressor Affected Facilities. The other three (3) compressor engines (i.e., ENG-008, ENG-009, & ENG-0011) are subject to NSPS 0000a reporting requirements as Reciprocating Compressor Affected Facilities.

Table 1 below provides a summary of the Reciprocating Compressor Affected Facilities under NSPS 0000 and 0000a and their Compliance Period.

Table 1. Summary of Reciprocating Compressor Affected Facilities under NSPS 0000 and 0000a


Source ID	AES Source ID	Commencement ¹ of Construction, modification, or reconstruction date	0000 Applicable?	0000a Applicable?	Compliance Period
ENG-001	101	April 21, 2014	Yes	No	August 2, 2018 - August 1, 2019
ENG-102	102	April 21, 2014	Yes	No	August 2, 2018 - August 1, 2019
ENG-103	103	April 21, 2014	Yes	No	August 2, 2018 - August 1, 2019
ENG-104	104	April 21, 2014	Yes	No	August 2, 2018 - August 1, 2019
ENG-105	105	April 21, 2014	Yes	No	August 2, 2018 - August 1, 2019
ENG-108	108	August 1, 2016 ²	No	Yes	August 2, 2018 - August 1, 2019
ENG-109	109	July 31, 2017 ²	No	Yes	August 2, 2018 - August 1, 2019
ENG-011	111	October 3, 2018	No	Yes	June 25, 2019 ³ - August 1, 2019

The attachments contain the required information for the affected facilities operated by Clermont during the last annual compliance period for NSPS Subpart 0000 and NSPS 0000a (August 2, 2018 through August 1, 2019). Attachment 1 includes the general information required by §60.5420(b)(1) and §60.5420a(b)(1). Attachment 2 provides the reciprocating compressor affected facilities reporting information required by §60.5420(b)(4) and §60.5420a(b)(4). Attachment 3 provides the fugitive emissions components monitoring survey information required by §60.5420a(b)(7). Attachment 4 provides the pneumatic controller affected facilities reporting information required by §60.5420a(b)(5). No other reporting is required either because Clermont (Clermont West Compressor Station) does not have any of the subject equipment or because the equipment as operated does not meet or exceed the threshold set for affected facilities.

Clermont had discovered and replaced four (4) pneumatic controller affected facilities as identified in §60.5365a(d)(1). Per §60.5390a(c)(1), Clermont replaced all four (4) pneumatic controller affected facilities on October 16, 2018 to comply with NSPS Subpart 0000 bleed rate requirements. Upon discovery, tags were installed on all pneumatic controller affected facilities per §60.5390a(c)(2) and steps were taken to replace the pneumatic controller affected facilities. It should be noted that Clermont does operate other pneumatic controllers installed after October 15, 2013, but these devices are intermittent and/or low-bleed devices. As such, they are not pneumatic controller affected facilities as defined under NSPS Subpart 0000 or NSPS Subpart 0000a.

In accordance with the rule, this report is being submitted within 90 days of the end of the compliance period (October 30, 2019). Should you have any questions or require additional information, please contact me at (716) 857-7124.

Sincerely,



Ryan Perfello
Environmental Associate II

cc: M. Barber J. Kittka
J. Ennis J. Welch
M. Kasprzak

¹ The dates represented are defined using the definition of *Commenced* as per §60.2

² The dates represented are defined using the definition of *Construction* as per §60.2

³ The compliance period of source ID ENG-011 began upon startup on June 25, 2019 as per §60.5370a(a)

ATTACHMENT 1
NFG Midstream Clermont, LLC - Clermont West Compressor Station

Combined NSPS 0000 and 0000a Annual Report

Pursuant to 40 CFR §60.5420(b) and §60.5420a(b)

Company Information

§60.5420(b)(1)(i) and §60.5420a(b)(1)(i)

Company Name: NFG Midstream Clermont, LLC				
Facility/Site Name: Clermont West Compressor Station				
Facility Coordinates:	41.589444	-78.469722		
	Latitude	Longitude		
Facility Address:	12753 Shawmut Grade Road	Emporium	PA	15834
	Street Address	City	State	Zip Code
Company Mailing Address:	6363 Main Street	Williamsville	NY	14221
	Street Address	City	State	Zip Code

For information regarding this report please contact the following:

Contact Name: Ryan Perrello
Contact Phone Number: (716) 857-7124
Contact Email Address: PerrelloR@natfuel.com

Affected Facilities Included in this Report

§60.5420(b)(1)(ii) and §60.5420a(b)(1)(ii)

NSPS 0000: Five (5) reciprocating compressors
NSPS 0000a: Three (3) reciprocating compressors, four (4) pneumatic controllers, and one (1) collection of fugitive emissions components

Reporting Period

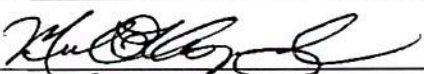
§60.5420(b)(1)(iii) and §60.5420a(b)(1)(iii)

Compliance Period Start Date: August 2, 2018
Compliance Period End Date: August 1, 2019

Certification By a Responsible Official

§60.5420(b)(1)(iv) and §60.5420a(b)(1)(iv)

Statement of Certification: Based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate and complete.

Name of Certifying Official: Michael P. Kasprzak
Title of Certifying Official: Manager, NFG Midstream Clermont, LLC
Email Address: KasprzakM@NatFuel.com
Phone Number: (814) 871-8601
Signature: 
Signature Date: 10/24/2019

ATTACHMENT 2

NFG Midstream Clermont, LLC - Clermont West Compressor Station

Reciprocating Compressor Affected Facilities Under NSPS 0000

Compressor Rod Packing Replacements

§60.5420(b)(4)

Equipment ID	Time since last rod packing change §60.5420(b)(4)(i)		Deviations during reporting period §60.5420(b)(4)(ii)
	Months	Notes	
ENG-001	7.75	Rod packing was replaced on December 10, 2018	None (all units have had rod packing replaced within the required timeframe, less than 26,000 hours or 36 months of service)
ENG-002	8.25	Rod packing was replaced on November 26, 2018	
ENG-003	7.5	Rod packing was replaced on December 18, 2018	
ENG-004	8.5	Rod packing was replaced on November 13, 2018	
ENG-005	9.75	Rod packing was replaced on October 10, 2018	

Reciprocating Compressor Affected Facilities Under NSPS 0000a

Compressor Rod Packing Replacements

§60.5420a(b)(4)

Equipment ID	Time since last rod packing change §60.5420a(b)(4)(i)		Deviations during reporting period §60.5420a(b)(4)(ii)
	Months	Notes	
ENG-011	1.25	No rod packing replacements have occurred since startup on June 25, 2019	None (all units have been in service less than 26,000 hours and 36 months)
ENG-008	3	Rod packing was replaced on April 30, 2019	
ENG-009	4.5	Rod packing was replaced on March 13, 2019	

ATTACHMENT 3
NFG Midstream Clermont, LLC - Clermont West
Compressor Station

Fugitive Emissions Components Monitoring Survey

§60.5420a(b)(7)

TABLE F1:
REQUIRED ELEMENTS FOR COLLECTION OF FUGITIVE EMISSIONS COMPONENTS [§60.5420a(b)(7)]

0000a CITATION	INFORMATION REQUIRED	RESPONSE PARAMETER	3rd Quarter 2018	4th Quarter 2018	1st Quarter 2019	2nd Quarter 2019	3rd Quarter 2019
§60.5420a(b)(7)(i)	Date of the survey.	DATE	8/13	10-17	3-13	5-16	7-24
§60.5420a(b)(7)(ii)	Beginning and end time of the survey.	Start Time End Time	10:40a 2:15p	12:35p 2:30p	1:15p 3:45p	7:50a 11:15a	8:00a 1:45p
§60.5420a(b)(7)(iii)	Name of operator(s) performing survey. If the survey is performed by optical gas imaging, you must note the training and experience of the operator.	See OGI Camera Operator List in Appendix A	Operators 1, 2, 3	Operators 1, 2, 3	Operators 1, 2, 3, 4	Operators 1, 2, 4	Operators 1, 4
§60.5420a(b)(7)(iv)	Ambient temperature, sky conditions, and maximum wind speed at the time of the survey.	Ambient Temp (°F) Sky Conditions Max Wind Speed (mph)	69.1 Overcast, misting 5.1	45.3 Overcast, sprinkling 6.9	50.9 Mostly Cloudy 7.8	55.8 Light Clouds, Clear 5.3	65.7 Clear 3.9
§60.5420a(b)(7)(v)	Monitoring instrument used.	See OGI Camera Notes Below	GFx320	GFx320	GFx320	GFx320	GFx320
§60.5420a(b)(7)(vi)	Any deviations from the monitoring plan or a statement that there were no deviations from the monitoring plan.	See Table F2 on p. 3-2					
§60.5420a(b)(7)(vii)	Number and type of components for which fugitive emissions were detected.	See Table F3 on p. 3-2					
§60.5420a(b)(7)(viii)	Number and type of fugitive emissions components that were not repaired as required in §60.5397a(h).	See Table F3 on p. 3-2					
§60.5420a(b)(7)(ix)	Number and type of difficult-to-monitor (DTM) and unsafe-to-monitor (UTM) fugitive emission components monitored.	No. DTM by Type No. UTM by Type	0 0	0 0	0 0	66 C* 0	0 0
§60.5420a(b)(7)(x)	The date of successful repair of the fugitive emissions component.	See Table F4 on p. 3-3					
§60.5420a(b)(7)(xi)	Number and type of fugitive emission components placed on delay of repair and explanation for each delay of repair.	See Table F5 on p. 3-4					
§60.5420a(b)(7)(xii)	Type of instrument used to resurvey a repaired fugitive emissions component that could not be repaired during the initial fugitive emissions finding.	See Table F6 on p. 3-5					

OGI Camera Notes
GFx320: FLIR GasFindIR GFx320

* C=Connectors on pigging, dehydrator and compressor waste tanks

ATTACHMENT 3

NFG Midstream Clermont, LLC - Clermont West Compressor Station

Fugitive Emissions Components Monitoring Survey

§60.5420a(b)(7)

TABLE F2:

DEVIATIONS FROM MONITORING PLAN [§60.5420a(b)(7)(vi)]

LEAK NUMBER	REPAIR DATE	DEVIATION DESCRIPTION
NO DEVIATIONS DURING THIS REPORTING YEAR		

TABLE F3:

VARIOUS REQUIREMENTS [§60.5420a(b)(7)(vii) and (viii)]

COMPONENT TYPE	§60.5420a(b)(7)(vii) Number of components for which fugitive emissions detected	§60.5420a(b)(7)(viii) Number of components not repaired ¹ as required in §60.5397a(h)
3rd Quarter 2018		
Valve	3	0
Connector	10	0
Open Ended Line	10	0
Flange	3	0
4th Quarter 2018		
Valve	2	0
Connector	8	0
Open Ended Line	2	0
1st Quarter 2019		
Valve	11	0
Connector	7	0
Open Ended Line	3	0
2nd Quarter 2019		
Valve	11	0
Connector	11	0
Open Ended Line	12	0
3rd Quarter 2019		
Valve	11	0
Connector	11	0
Open Ended Line	10	0
Other	1	0

¹ See Deviation Descriptions in Table F2

ATTACHMENT 3
NFG Midstream Clermont, LLC - Clermont West Compressor Station

Fugitive Emissions Components Monitoring Survey

§60.5420a(b)(7)

TABLE F4:
DATES OF SUCCESSFUL REPAIR [§60.5420a(b)(7)(x)]

LEAK NUMBER	DATE REPAIRED
Leaks Identified prior to this Reporting Year	
20180312-2; 20180611-2, -3, -4	8/13/2018
20180313-11	8/28/2018
20180611-17	10/4/2018
Leaks Identified during 3rd Quarter 2018	
20180813-6, -7	8/13/2018
20180813-12, -13, -14, -16, -17	8/23/2018
20180813-1, -5, -10	8/24/2018
20180813-9	8/25/2018
20180813-2, -4, -20	8/28/2018
20180813-19	9/22/2018
20180813-15	9/27/2018
20180813-11	12/10/2018
20180813-18	5/16/2019
Leaks Identified during 4th Quarter 2018	
20181017-1, -3, -8	10/17/2018
20181017-6, -7	10/30/2018
20181017-4, -5	10/31/2018
Leaks Identified during 1st Quarter 2019	
20190313-2	3/13/2019
20190313-14, -15, -16, -17	3/16/2019
20190313-10	3/30/2019
20190313-8	4/17/2019
20190313-13	5/30/2019
20190313-11	6/24/2019
20190313-5, -9, -11, -12	6/13/2019
20190313-4	7/3/2019
Leaks Identified during 2nd Quarter 2019	
20190516-3, -4, -5, -6, -8, -9, -10	5/16/2019
20190516-7, -17	5/30/2019
20190516-15, -19, -20	6/13/2019
20190516-12	7/24/2019
20190516-18	7/31/2019
Leaks Identified during 3rd Quarter 2019	
20190724-4, -5, -8, -9, -17	7/24/2019

ATTACHMENT 3

NFG Midstream Clermont, LLC - Clermont West Compressor Station

Fugitive Emissions Components Monitoring Survey

§60.5420a(b)(7)

TABLE F5:
COMPONENTS ON DELAY OF REPAIR AND EXPLANATION [§60.5420a(b)(7)(xi)]

COMPONENT TYPE	LEAK NUMBER ¹	DELAY OF REPAIR DESCRIPTION
Leaks Identified prior to this Reporting Year		
Connector	20180611-1	Technically infeasible
Open Ended Line	20180312-2, 20180313-11, 20180611-2, -3, -4	Technically infeasible
Valve	20180611-17	Unsafe to repair while unit operating
Leaks Identified during 3rd Quarter 2018		
Connector	20180813-3, -11, -15, -18	Technically infeasible, unsafe to repair while unit operating
Valve	20180813-19	Technically infeasible, unsafe to repair while unit operating
Leaks Identified during 4th Quarter 2018		
Valve	20181017-2	Requires station shutdown
Leaks Identified during 1st Quarter 2019		
Connector	20190313-1	Requires station shutdown
Valve	20190313-3	Requires station shutdown
Valve	20190313-4, -9, -11, -12	Technically infeasible
Valve	20190313-5	Technically infeasible, unsafe to repair while unit operating
OEL	20190313-6, -7	Technically infeasible, unsafe to repair while unit operating
Connector	20190313-13	Technically infeasible
Leaks Identified during 2nd Quarter 2019		
Open Ended Line	20190516-1, -11	Technically infeasible, requires station shutdown
Open Ended Line	20190516-2, -12	Technically infeasible, unsafe to repair while unit operating
Valve	20190516-13, -16, -18	Technically infeasible
Connector	20190516-14	Technically infeasible, unsafe to repair while unit operating
Leaks Identified during 3rd Quarter 2019		
Reporting period ended before 30 day repair threshold		

¹ Most components listed have been repaired as of the end of the reporting year.

ATTACHMENT 3

NFG Midstream Clermont, LLC - Clermont West Compressor Station

Fugitive Emissions Components Monitoring Survey

§60.5420a(b)(7)

TABLE F6:

INSTRUMENT USED TO SURVEY REPAIRED COMPONENT* [§60.5420a(b)(7)(xii)]

LEAK NUMBER	SURVEY METHOD
20180813-1, -5, -9, -10, -11, -12, -13, -14, -15, -16, -17, -19, -20 20181017-4, -5, -6, -7 20190313-4, -5, -8, -9, -10, -11, -12, -14, -15, -16, -17 20190516-15, -18, -19, -20	Soapy Water
20180312-2 20180611-2, -3, -4, -17 20180813-2, -4, -6, -7, -18, 20190313-2, -13 20190516-7, -12, -17	OGI

OGI: Optical gas imaging

* Only components "that could not be repaired during the initial fugitive emissions finding".

Attachment 4
NFG Midstream Clermont, LLC - Clermont West Compressor Station

Pneumatic Controller Affected Facilities

§60.5420a(b)(5)

Equipment Location	Tag Number	Month/Year of Installation	Explanation if greater than 6 scf/h	Deviations to Report? (If deviations occurred put an "X". If not leave blank)
ENG-009 Low Pressure Filter North	CW-F001532115-2500	March 2018	Continuous bleed pneumatics were inadvertently installed during the construction of ENG-009. Since discovering their presence on July 16, 2018, steps have been taken to replace them with pneumatic controllers that are not regulated as pneumatic controller affected facilities as described in §60.5465a(d)(1). On October 16, 2018, these four (4) pneumatic controller affected facilities were replaced with controllers that are not regulated as pneumatic controller affected facilities as described in §60.5465a(d)(1).	X
ENG-009 Low Pressure Filter South	CW-F001532113-2500	March 2018		X
ENG-009 Medium Pressure Filter North	CW-F001532114-2500	March 2018		X
ENG-009 Medium Pressure Filter South	CW-F001532116-2500	March 2018		X

Appendix A
NFG Midstream Clermont, LLC - Clermont West Compressor Station

Fugitive Emissions Components Monitoring Survey

§60.5420a(b)(7)

OPTICAL GAS IMAGING (OGI) CAMERA OPERATOR LIST

OPERATOR NO. 1	
Name	David P. Simmons
Company	Innovative Environmental Solutions, Inc.
Training	Certified OGI Thermographer from Infrared Training Center in 2015
Experience	OGI operator since 2011, over 250 hours with FLIR GasFindIR GF-320 and GFx320
OPERATOR NO. 2	
Name	Brad Chandler
Company	Innovative Environmental Solutions, Inc.
Training	Operated with oversight by Certified OGI Thermographer for more than 100 hours
Experience	OGI operator since 2016, over 150 hours with FLIR GasFindIR GF-320 and GFx320
OPERATOR NO. 3	
Name	Chad Austin
Company	NFG Midstream Clermont, LLC
Training	Certified OGI Thermographer from Infrared Training Center in 2017
Experience	OGI operator since October 2017, over 75 hours with FLIR GasFindIR GFx320
OPERATOR NO. 4	
Name	Jared Heschke
Company	NFG Midstream Clermont, LLC
Training	Operated with oversight by Certified OGI Thermographer for more than 40 hours
Experience	OGI operator since March 2019, over 40 hours with FLIR GasFindIR GFx320